

1 JOHN J. JORDAN, ESQ. (Cal. State Bar No. 175678)  
2 400 Montgomery Street  
3 Suite 200  
4 San Francisco, CA 94104  
(415) 391-4814  
(415) 391-4308 (FAX)

5 Attorney for Defendant  
CRISTETA LAGAREJOS

6 UNITED STATES DISTRICT COURT

7 NORTHERN DISTRICT OF CALIFORNIA

8 OAKLAND DIVISION

9 UNITED STATES OF AMERICA, ) No. CR-08-0477 DLJ

10 Plaintiff, )

) **STIPULATED MOTION AND  
PROPOSED ORDER TO  
ALLOW DEFENDANT TO TRAVEL  
TO THE EASTERN DISTRICT  
OF CALIFORNIA AND NEVADA**

11 v. )

12 CRISTETA LAGAREJOS, )

) No Hearing Requested

13 Defendant. )

14 \_\_\_\_\_  
15  
16 The defendant CRISTETA LAGAREJOS, through her attorney John  
17 J. Jordan, hereby moves for an order allowing the defendant to  
18 travel to the Eastern District of California and the District of  
19 Nevada between August 22, 2008 and August 25, 2008, in order to  
20 attend a previously scheduled short vacation in Lake Tahoe.

21 1. The defendant is currently on pre-trial release in the  
22 above-entitled case. Her current conditions of release restrict  
23 her travel to the Northern District of California.

24 2. The defendant is currently in compliance with the  
25 conditions of her pre-trial release.

26 3. Ms. Lagarejos would like to attend this previously  
27 scheduled vacation with her partner, which was planned before the  
28

current indictment was returned. Counsel for defendant has only recently been provisionally appointed and was unable to bring the motion at an earlier time.

4. United States Pre-Services Officer Hence Williams has informed counsel that he has no objection to this request, as long as the defendant provides a travel itinerary to his office in advance of defendant's travel.

5. On August 20, 2008, Assistant U.S. Attorney Deborah R. Douglas, the prosecutor in this case, informed counsel that she has no objection to this request.

WHEREFORE, the defendant respectfully requests  
that this Court issue an order allowing the defendant to travel  
between the Northern District of California and the Eastern  
District of California and the District of Nevada from August 22,  
2008 until August 25, 2008.

Dated: August 20, 2008

Respectfully submitted,

JOHN J. JORDAN  
Attorney for Cristeta Lagarejos

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA, ) No. CR-08-0477 DLJ  
Plaintiff, )  
) (Proposed) **ORDER**  
v. )  
CRISTETA LAGAREJOS, )  
Defendant. ) No Hearing Requested

FOR GOOD CAUSE SHOWN, the pretrial release conditions of the defendant CRISTETA LAGAREJOS are amended to allow the defendant to travel between the Northern District of California and the Eastern District of California and the District of Nevada from August 22, 2008 until August 25, 2008, all other release conditions to remain unchanged.

Prior to any such travel, the defendant is to provide a travel itinerary to United States Pretrial Services.

**IT IS SO ORDERED**

Date: August \_\_, 2008

HON. D. LOWELL JENSEN  
United States District Judge